U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

DEC 19 2000

Mr. M Chandran
Senior Officer
Singapore Airlines Ltd
Airline House 05A
Singapore 819829

Ref. No. 00-0238

Dear Mr. Chandran:

This is in response to your letter dated August 4, 2000, regarding the classification and packaging of aircraft fuel control units under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your questions are paraphrased and answered as follows:

Q1. The Federal Aviation Administration published Dangerous Goods Advisory Bulletin (DGAB) 98-02 in 1998. This document addressed concerns over fuel control units being improperly packaged and leaking while in transportation. Have any amendments to DGAB 98-02 been published?

A1. No.

Q2. The HMR and the International Air Transport Association Dangerous Goods Regulations (IATA DGR) show different proper shipping names for fuel control units: "Fuel, aviation, turbine, engine" and "Dangerous goods in machinery or apparatus," respectively. Are we in compliance with the HMR by using either description?

A2. The shipping description "Dangerous goods in machinery or apparatus" was adopted into the HMR in a final rule published on March 5, 1999 (Docket HM-215C; 64 FR 10742). It is our opinion that "Dangerous goods in apparatus" is the more appropriate shipping description.

Under the conditions specified in § 171.11 of the HMR, we recognize the International Civil Aviation Organization (ICAO) Technical Instructions for the Safe Transport of Dangerous Goods by Air. Therefore, an aircraft fuel control unit may be shipped in accordance with the ICAO Technical Instructions or the HMR. The classification and packaging requirements for fuel control units in the IATA DGR are the same as those contained in the ICAO Technical Instructions.

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Q3. Is polystyrene acceptable as an absorbent material when packaged with a flammable liquid?

A3. Polystyrene may be used as a absorbent material only if it conforms to the conditions prescribed in §§ 173.24 and 173.27. In § 173.24, paragraphs (e)(1) and (2) state that the packaging material must be compatible with the lading. Section 173.27(e) states that the absorbent material must be capable of absorbing without reacting dangerously with the liquid.

I trust this satisfies your request. Please contact us if we can be of further assistance.

Sincerely,

Hattie L. Mitchell

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
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Goods in equipment, Machinery c apparati
Shipping Nam
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04 August 2000

Dear Mr Mazzullo,

RE: FAA DANGEROUS GOODS ADVISORY BULLETIN
REF: DGAB 98-02 DD Apr 7, 1998

SHIPPING OF FUEL CONTROL UNITS
AND FUEL RELATED UNITS.

With reference to DGAB 98-02 of April 7th 1998, FCU containing aviation fuel can be prepared for transportation as follows:

As per 49 CFR

Fuel aviation, turbine engine, CL 3, UN1863. PG II or III
Or
Residue, last contained Fuel, aviation, turbine engine CL 3, UN1863, PG II or III

OR

As per ICAO/IATA

Dangerous goods in apparatus, ID 8001
Or
Dangerous goods in machinery, ID 8001

The bulletin states that ID 8001 is under consideration for adoption by the UN Committee of Experts and the US is planning to propose its inclusion into the Hazardous Materials Regulations. But it still appears in the 41st Edition of the DGR as ID 8001.

Would appreciate your advice on the following:

A. Are there any amendments to DGAB 98-02 ?

B. Although 49 CFR and IATA shows two different method of declaring, are we contravening any law by declaring and shipping the FCU, containing aviation fuel, under UN 1863.

C. Can POLYSTYRENE material be used as an absorbent material? Can it be packed with components containing flammable liquid.

Thank you in advance for your kind assistance.

Yours Sincerely,

Chandran

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